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REPORT ON THE FILING OR DETERMINATION OF AN

FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court Northern District of California on the following Patents or G Trademarks:

DOCKET NO.	DATE FILED 7/12/2011	U.S. DISTRICT COURT Northern District of California
PLAINTIFF		DEFENDANT
Innovative Automation	LLC	Mediatechnics Systems, Inc.; Tibi Szilagya; Coptech Ogita Inc. 11 3410
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	
1 7,174,362	2/6/2007	Innovative Automation LLC
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DATE INCLUDED PATENT OR	INCLUDED BY	ing patent(s)/ trademark(s) have been included: Amendment G Answer G Cross Bill G Other Pleading
TRADEMARK NO.	OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
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In the abo	ve—entitled case, the followi	ring decision has been rendered or judgement issued:
CLERK		(BY) DEPUTY CLERK DATE

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GUTRIDE SAFIER LLP ADAM J. GUTRIDE (State Bar No. 181446) adam@gutridesafier.com SETH A. SAFIER (State Bar No. 197427) seth@gutridesafier.com TODD KENNEDY (State Bar No. 250267) todd@gutridesafier.com 835 Douglass Street San Francisco, California 94114 Telephone: (415) 789-6390 Facsimile: (415) 449-6469



BOOKE & AJLOUNY LLP

VICTORIA L.H. BOOKE (State Bar No. 142518) E-filing

vbooke@gmail.com

PETER AJLOUNY (State Bar No. 192322)

peter@bookelaw.com 606 North First Street

San Jose, California 95112 Telephone: (408) 286-7000 Facsimile: (408) 286-7111

Attorneys for Plaintiff

HRI

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

3410 SAN FRANCISCO DIVISION

INNOVATIVE AUTOMATION LLC.

Plaintiff.

MEDIATECHNICS SYSTEMS, INC.; TIBI SZILAGYA, an individual; COPTECH DIGITAL, INC.,

Defendants

Case No.

COMPLAINT FOR PATENT INFRINGEMENT

DEMAND FOR JURY TRIAL

Date: July 12, 2011

Plaintiff Innovative Automation LLC states its complaint against Defendants
Mediatechnics Systems, Inc., Tibi Szilagya, and Coptech Digital, Inc., and alleges as
follows:

THE PARTIES

- Plaintiff Innovative Automation LLC ("Plaintiff" or "Innovative Automation")
 is a limited liability company organized and existing under the laws of the State of
 California, with its principal place of business at 606 North First Street, San Jose, California
 95112.
- 2. On information and belief, Defendant Mediatechnics Systems, Inc. ("Mediatechnics") is a corporation that, during at least part of the relevant period, was organized and existing under the laws of the State of California, with its principal place of business at 4 Bluehill Court, Scotts Valley, California 95066. On information and belief, one or more individuals continue to operate the business of Mediatechnics, and to sell products under the Mediatechnics name, although the corporate status of Mediatechnics has been suspended.
- 3. On information and belief, Defendant Tibi Szilagya is an individual residing at 4 Bluehill Court, Scotts Valley, California 95066. On information and belief, Mr. Szilagya has directed the operations of Mediatechnics during the entirety of the relevant period—both before and after Mediatechnics' corporate status was suspended.
- 4. On information and belief, Defendant Coptech Digital, Inc. ("Coptech") is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with its principal place of business at 100 Cummings Park, Woburn, Massachusetts 01801.

JURISDICTION AND VENUE

 Plaintiff realleges and incorporates by reference paragraphs the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

- This action is for patent infringement pursuant to the patent laws of the United States, 35 U.S.C. §§ 1 et seq. This Court has subject matter jurisdiction over the action pursuant to 28 U.S.C. §§ 1331 and 1338(a).
- 7. This Court has personal jurisdiction over Defendant Mediatechnics Systems, Inc. because, on information and belief, Mediatechnics does and has done substantial business in this judicial District, including (i) maintaining its principal place of business in this judicial District; (ii) committing acts of patent infringement and/or contributing to or inducing acts of patent infringement by others in this judicial District and elsewhere in California; and (iii) regularly doing business or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from products and/or services provided to persons in this District and in this State.
- 8. This Court has personal jurisdiction over Defendant Tibi Szilagya because, on information and belief, Mr. Szilagya resides in this judicial District, and because Mr. Szilagya does and has done substantial business in this judicial District, including (i) directing the operations of Mediatechnics Systems, Inc., which maintained and maintains its principal place of business in this judicial District; (ii) committing acts of patent infringement and/or contributing to or inducing acts of patent infringement by others in this judicial District and elsewhere in California; and (iii) regularly doing business or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from products and/or services provided to persons in this District and in this State.
- 9. This Court has personal jurisdiction over Defendant Coptech Digital, Inc. because, on information and belief, Coptech does and has done substantial business in this judicial District, including (i) committing acts of patent infringement and/or contributing to or inducing acts of patent infringement by others in this judicial District and elsewhere in California; (ii) making significant purchases of infringing products in this judicial District; and (iii) regularly doing business or soliciting business, engaging in other persistent courses

of conduct, and/or deriving substantial revenue from products and/or services provided to persons in this District and in this State.

10. Venue is proper in this judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b) because, on information and belief, the Defendants have committed acts of direct and indirect infringement in this judicial District and have transacted business in this judicial District. In addition, Defendant Mediatechnics has its headquarters and/or facilities in this judicial District, and Defendant Szilagya resides in this judicial District.

CLAIM FOR RELIEF

(Infringement of United States Patent No. 7,174,362)

- 11. Plaintiff realleges and incorporates by reference paragraphs the above paragraphs of this Complaint, inclusive, as though fully set forth herein.
- 12. Plaintiff is the owner of all right, title, and interest in United States Patent No. 7,174,362, entitled "Method and System for Supplying Products from Pre-Stored Digital Data in Response to Demands Transmitted via Computer Network," duly and legally issued by the United States Patent and Trademark Office on February 6, 2007 (the "'362 patent"). A true and correct copy of the '362 patent is attached hereto as Exhibit A.
- 13. The '362 patent generally describes and claims a computer-implemented method of digital data duplication. In the method of claim 1 of the '362 patent, a request is taken at one or more user interfaces and is transmitted through a network to a computer. The computer contains a module to create a task log based on incoming requests; a module for storing the necessary data; and a module to create a subset of the data, download that subset to an output device, and command the device to transfer the subset onto blank media. The request is assigned to an output device, and the duplication process is executed. Claims 2-8 of the '362 patent describe various other methods and a system of digital data duplication.
 - On information and belief, Mediatechnics Systems, Inc. has contributorily infringed and continues to contributorily infringe one or more claims of the '362 patent,

literally and/or under the doctrine of equivalents, by making, offering to sell, and selling devices that (1) constitute a material part of the invention of the '362 patent, (2)

Mediatechnics knows to be especially adapted for use in infringing the '362 patent, and (3) are not staple articles of commerce suitable for substantial noninfringing use with respect to the '362 patent. These devices include at least the Mediatechnics Fusion KVM, and are used by companies, such as those that offer digital media duplication services, in a way that directly infringes one or more claims of the '362 patent. In addition, Mediatechnics has directly infringed, and continues to directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the '362 patent under 35 U.S.C. § 271 by using the claimed method(s) of duplicating digital data while (i) testing these devices; and (ii) using these devices to perform digital media duplication services such as optical media duplication services.

- 15. On information and belief, Tibi Szilagya has contributorily infringed and continues to contributorily infringe one or more claims of the '362 patent, literally and/or under the doctrine of equivalents, by making, offering to sell, and selling devices that (1) constitute a material part of the invention of the '362 patent, (2) Mr. Szilagya knows to be especially adapted for use in infringing the '362 patent, and (3) are not staple articles of commerce suitable for substantial noninfringing use with respect to the '362 patent. These devices include at least the Mediatechnics Fusion KVM, and are used by companies, such as those that offer digital media duplication services, in a way that directly infringes one or more claims of the '362 patent. In addition, Mr. Szilagya has directly infringed, and continues to directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the '362 patent under 35 U.S.C. § 271 by using the claimed method(s) of duplicating digital data while (i) testing these devices; and (ii) using these devices to perform digital media duplication services such as optical media duplication services.
- 16. Defendant Coptech Digital, Inc. has infringed, and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the '362 patent

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under 35 U.S.C. § 271 by using the claimed method(s) of duplicating digital data while performing digital media duplication services such as its optical media duplication services.

- 17. As a result of each Defendant's infringing activities, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for each Defendant's infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs.
- Plaintiff reserves the right to allege, after discovery, that each Defendant's infringement is willful and deliberate, entitling Plaintiff to increased damages under 35 U.S.C. § 284, and to attorneys' fees incurred in prosecuting this action under 35 U.S.C. §

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests entry of judgment in its favor against each Defendant as follows:

- For a declaration that each Defendant has infringed, directly and/or indirectly, the '362 patent;
- b) For an award of damages adequate to compensate Plaintiff for each Defendant's infringement of the '362 patent, but in no event less than a reasonable royalty, together with prejudgment and post-judgment interest and costs, in an amount according to proof;
- c) For an entry of a permanent injunction enjoining each Defendant, and its respective officers, agents, employees, and those acting in privity, from further infringement, including contributory infringement and/or inducing infringement, of the '362 patent, or in the alternative, awarding a royalty for post-judgment infringement;
- d) For an award of attorneys' fees pursuant to 35 U.S.C. \S 285 or as otherwise permitted by law; and
- e) For an award to Plaintiff of such other costs and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL 1 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully 2 requests a trial by jury. 3 Respectfully submitted, 5 GUTRIDE SAFIER LLP Dated: July 12, 2011 6 7 8 Adam J. Gutride, Esq. Seth A. Safier, Esq. Todd Kennedy, Esq. 10 835 Douglass Street San Francisco, California 94114 11 Telephone: (415) 789-6390 Facsimile: (415) 449-6469 12 Victoria L.H. Booke 13 Peter Ailouny BOOKE & AJLOUNY LLP 14 606 North First Street San Jose, California 95112 15 Telephone: (408) 286-7000 Facsimile: (408) 286-7111 16 Attorneys for Plaintiff Innovative 17 Automation LLC 18 19 20 21 22 23 24 26 27 28

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CIVIL COVER SHEET

The B 54 civic locates heat and be information contained herein neither replace nor supplement the filling and service of pleadings or other papers as required by law, except as provided by local nates of court. This form, approved by the Jodical Conference of the United States in September 1974, is required for the use of the Clerk of Coart for the purpose of indisting the end docked states. CEBE INSTRUCTIONS ON PARGE TWO OF THE FORM).

I.	(a) PLAINTIFFS				DEFENDANTS						
INNOVATIVE AUTOMATION LLC						MEDIATECHNICS SYSTEMS, INC.; TIBI SZILAGYA; COPTECH DIGITAL, INC.					
110	(b) Courty of Residence of First Listed Plaintiff Santa Clara (EXCEPT IN U.S. PLAINTIFF CASES) (b) Attorney's (Firm Name, Address, and Telephone Number)				NOTE: IN LAND C	County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY) NOTE: INLAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED. Attorneys (If Known)					
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